

20-30021-hcm Doc#151-21 Filed 09/10/21 Entered 09/10/21 17:34:38 Exhibit Pg 1 of 1

RE: JESUS PINEDA - ALLSTATE AND OAKSTREET; Chapter 13 Case#20-30021

From: Yearly, Kathy
To: paralegal-2@lawofficessmrn.com
Cc: MNVarrez@LawOfficesMRN.com, Jeff Carruth, Chandler, Alicia
Sent: 8/2/2021 1:33:17 PM

Attachments: [Copy of CCA TPP Summary 7.20.2021 - ATTACHMENT TO AO.XLSX](#) [Payoff Quote 118287 Estimated 24 months of TPP Payments.nof](#) [FB Allstate CP4020210802.105717.nof](#) [Collection Cost Data 20210802.pdf](#) [Amortization Schedule - 118287.nof](#) [2980012906 - 2021-04.pdf](#) [2980012906 - 2021-06.pdf](#) [2980012906 - 2021-05.pdf](#)

Good Afternoon,

Please see attached my responses and below. I'm happy to have a call if you have any questions.

Thanks,
Kathy**Kathy Yearly**

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From: paralegal-2@lawofficessmrn.com [mailto:paralegal-2@lawofficessmrn.com]
Sent: Friday, July 30, 2021 6:53 PM
To: Yearly, Kathy <KathyYearly@oakstreetfunding.com>
Cc: MNVarrez@LawOfficesMRN.com
Subject: RE: JESUS PINEDA - ALLSTATE AND OAKSTREET; Chapter 13 Case#20-30021

Importance: High

Hello Kathy,

I'm Mr. Nevarrez' paralegal and I'm reaching out to you in regards to the OSF's settlement proposal spreadsheet. I have the following questions regarding the items highlighted in yellow in your attached spreadsheet:

1. "Estimated OSF Payoff Dec 2022" in the amount of \$211,081.39, how was this number calculated? Please provide supporting documentation: The payoff is an estimate only. Based on 24 TPP Payments from Allstate and rate is variable. See attached.
2. Please explain what the \$11,198.31 "Amount Due to get OSF Current" includes and provide supporting documentation showing how many months Mr. Pineda is behind. Past Due Payments for April, May and June. We are now past due for the July payment. Making the amount \$14,959.68
3. "Legal Due (last invoice 6/9)" of \$6,667.00, what does this include. Please provide supporting documentation Legal fees for outside counsel
4. As for the monthly OSF payments, there are a few different amounts that I have come across:
 - a. The \$4,363.00 "Pay To Seller" amount that Allstate was previously sending per month (not in your spreadsheet) This amount was the Commission Payment Agreement that was sent each month from Allstate (see attached). Per loan documents, if requires were met anything minus the payment and sweepback cap was released back to Mr. Pineda each month. Last Payment received was January 20, 2022 when Mr. Pineda decided to terminate his contract with Allstate.
 - b. The "July 25th payment" of \$3,761.37. This is the July 25th payment now past due.
 - c. "Est OSF Payment" of \$3,762.82. Payments are based on 360/Actual Days (paid in arrears). See amortization schedule.

What is the correct monthly payment, and what is the interest rate? The current interest rate is 8.75%. Variable after first 2 years. See amortization schedule.

5. The CCA balance of \$87,095.21 is made up of \$68,495.96 (TPP), \$17,123.24 (TPP) and \$1,479.01 (existing amount in CCA). Is the correct? And is the \$1,479.01 a pre-petition amount that was in the CCA? \$68,492.96 1 – 4 months of TPP Payments from Allstate deposited 4/20/21; 5/6/2021 \$17,123.24 5th TPP payment; 5/19/21 \$79.88 Misc. deposit from Allstate; \$1,384.85 Balance in CCA prior to first TPP payment and \$12.17 Interest on bank account 5/28 and 6/30. See attached bank statements.

Please let me know if you have any questions.

Thank you,
Dennis Dominguez, Malias
Paralegal

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